

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FASCIA EDWARDS,)	
)	
Plaintiff,)	
)	No. 12 C 371
v.)	Hon. Marvin Aspen
)	
ILLINOIS DEPARTMENT OF FINANCE)	
PROFESSIONAL REGULATIONS, et al.)	
)	
Defendants.)	

DEFENDANT'S MOTION IN LIMINE NO. 6
TO BAR EVIDENCE OF AND REFERENCE TO ALL CLAIMS IN THIS ACTION
WHICH HAVE BEEN PREVIOUSLY DISMISSED

Defendant, by and through its attorney, Lisa Madigan, Attorney General for Illinois, hereby moves this Honorable Court to enter the following order *in limine*:

1. On September 22, 2016, the Court granted the Defendant's Motion for Summary Judgment as to Plaintiff's Title VII claims, her ADEA claims, her Rehabilitation Act claims, and her ADA disability discrimination claim. Mem. Op. & Order at 32 (N.D. Ill. Sept. 22, 2016) (ECF No. 197).

2. In light of the Court's ruling, Defendant respectfully moves this Court to bar any evidence of, reference to, or argument regarding her previously-dismissed claims under Title VII for race and gender discrimination, under the Rehabilitation Act for disability discrimination, and under the ADA for failure to reinstate/rehire.

3. In addition, Defendant respectfully moves this Court to bar any mention of actions associated with those claims under Federal Rules of Evidence 402 and 403. Any allegations that occurred prior to the accrual of Plaintiff's disability claims (in essence, actions prior to her injury in June, 2009), are not relevant and would operate to mislead the jury. Such

allegations include but are not limited to: Plaintiff's administrative charges, the posting of "REDRUM" on the door of her office area; being assigned to a different job than the one to which she applied; her supervisor keeping a "secret journal" regarding her conduct; her working in a hostile environment; and her emotions regarding these issues and any medical treatment she sought because of these issues.

WHEREFORE, Defendant moves this Honorable Court enter an Order: (1) excluding evidence, testimony, or argument related to the claims in this action for which judgment has been entered in favor of Defendants; (2) excluding evidence, testimony, or argument regarding any actions associated with those dismissed claims; and (3) for such further relief that the Court finds reasonable and just.

Respectfully Submitted,

LISA MADIGAN
Illinois Attorney General

s/ Kevin Lovellette
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 16, 2017, he electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of Illinois using the CM/ECF system. All participants in the case are registered CM/ECF users who will be served by the CM/ECF system.

s/ Kevin Lovellette